1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 ABG-SHARK, LLC, a Delaware limited No. 2:20-mc-0030 RSL liability company, RESPONSE TO NOTICE OF 10 INACTIVITY AND STATUS REPORT 11 Judgment Creditor, 12 v. ORGANO GOLD INT'L, INC., a Nevada 13 corporation, 14 Judgment Debtor. 15 16 Judgment Creditor, ABG-Shark, LLC ("Judgment Creditor") submits the following status 17 report in response to this Court's Notice of Inactivity (Dkt. 6), to provide information concerning 18 19 its ongoing judgment collection efforts: 20 This is a post-judgment action to enforce a judgment entered in the United States District 21 Court for the Southern District of Florida in the matter of Organo Gold, Int'l, Inc. v. Aussie Rules 22 Marine Services, LTD., et. al., 18-CIV-80758-RAR in favor of ABG-Shark, LLC as Judgment 23 Creditor, against Organo Gold, Int'l, Inc. as Judgment Debtor, in the amount of \$1,800,00.00 (the 24 "Judgment"). 25 26

RESPONSE TO NOTICE OF INACTIVITY AND STATUS REPORT (2:20-mc-0030 RSL) - 1

1	On May 11, 2020, this Court issued a Writ of Execution (Dkt. 5). Since that date, Judgment
2	Creditor has been diligently attempting to coordinate the execution of the writ, including with the
3	U.S. Marshal's Office. Unfortunately, the execution of the writ has been delayed as a result of
4	office closures, risks and other obstacles associated with the COVID-19 pandemic.
5	The U.S. Marshal's office more recently informed the Judgment Creditor that a Judgment
7	Creditor representative will need to accompany the U.S. Marshal in executing the writ. Given the
8	continued significant health risks and travel disruptions associated with the highly transmissible
9	COVID-19 omicron variant, Judgment Creditor requires additional time to coordinate the
10	execution efforts with the U.S. Marshal's office in a safe manner.
11	For the reasons set forth above, Judgment Creditor respectfully requests that the Court
12	allow Judgment Creditor an additional 180 days to coordinate the execution of the writ.
13	anow radginess creditor an additional 100 days to coordinate the execution of the with
14	Dated: December 29, 2021
15	Dated. December 29, 2021
16	STOEL RIVES LLP
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